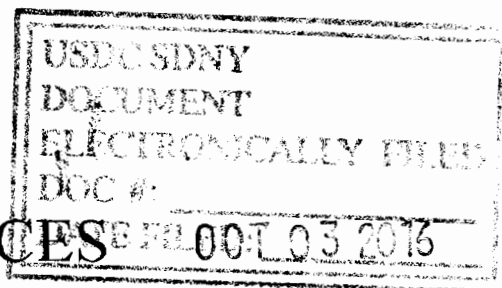


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DENIED
George B. Daniels
Judge George B. Daniels

OCT 03 2016

September 13, 2016

Via Fax (212.805.6737)

The Honorable George B. Daniels
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *In re JP Morgan Chase & Co. Sec. Litig.*, No. 12-cv-3852-GBD
Motion for Appeal Bond, Scheduling of Oral Motion to Appear *Pro Hac Vice*

Dear Judge Daniels:

I write on behalf of absent class member and objector Jeffrey M. Brown to inform the Court of my intention to: (a) present an oral motion for admission *pro hac vice*; (b) file a motion for substitution of counsel on behalf of Mr. Brown; and (c) file an *ex parte* application for leave to file an "out-of-time" opposition to Lead Plaintiffs' motion for an order requiring Mr. Brown to post an appeal bond of \$55,000 as security for the costs associated with his appeal of this Court's approval of the Settlement and award of attorneys' fees and expenses. See, ECF Nos. 217-219.

There is no dispute that Mr. Brown and his appellate counsel, Patrick Sweeney, were served with the bond moving papers. See, ECF No. 220. As a

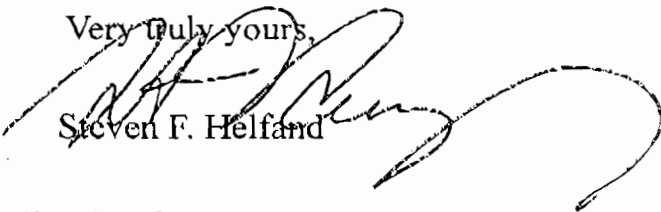
result of miscommunication between Messrs. Sweeney and Brown, no timely opposition was filed. It is my hope that the Court shall permit an opposition brief to be filed; albeit one that is admittedly tardy. In light of my recent engagement in this matter and so as to move promptly and without delay, I would like to personally appear in Court so as to make an emergency request for admission *pro hac vice* by way of oral motion with the administrative materials to follow.

Would the Court be so kind as to let me know a convenient time to personally appear and move for *pro hac vice* admission orally. It might also make practicable sense at that time to set a schedule for the filing of the substitution motion and *ex parte* application and/or "out of time" opposition brief.

I reside in Miami Beach, Florida, and can travel to the Southern District of New York with twenty-four ("24") hours notice. My schedule is open for the remainder of this week and all of next week should the Court permit the personal appearance and oral motion. It is best to contact me *via* email or by way of telephone.

Thank you for consideration of this letter. I have copied counsel for Lead Plaintiffs and Defendant.

Very truly yours,


Steven F. Helfand

John Rizio-Hamilton (via email: johnr@blbglaw.com)

Daniel L. Berger (via email: dberger@gelaw.com)

Andrew L. Zivitz (via email: azivitz@ktmc.com)

Daryl Andrew Libow (via email: libowd@sullerom.com)